UNITED STATES BANKRUPTCY COURT MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13

MARIANNE MEHALSHICK

(Debtor)

: Case No. 18-13758

MOTION TO CONVERT CASE TO CHAPTER 7

AND NOW comes the Debtor, MEGAN A. WATKINS, by and through who are undersigned Counsel, and hereby respectfully move this Court as follows:

- 1. The Debtor initiated this Bankruptcy proceeding pursuant to Chapter 13 of the Bankruptcy Code.
- 2. The Debtor initiated these proceedings to save her residence; however, since the original filing the residence has been lost to the secured lender; the Debtor is unable to support the Chapter 13 Plan.
- 3. The Debtor has decided she has no choice but to convert these proceedings to a Chapter 7.

THEREFORE, Debtor prays for an Order Converting this proceeding to a Chapter 7 proceeding, and for such other relief as is just equitable.

Respectfully submitted,

BY:

RONALD V. SANTORA, ESQ.

(Attorney for Debtor)

UNITED STATES BANKRUPTCY COURT MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	CHAPTER 13
MARIANNE MEHALSHICK	:	
(Debtor)	:	
	:	Case No. 18-13758
ORI	<u>DER</u>	
AND NOW THIS day of		_,2019, upon Motion of the Debtor, the
above captioned Case is hereby converted to a C	hapter '	7.
BY	THE C	COURT:
		J.